



September 14, 2012

Public Safety and Homeland Security Bureau
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325-7245

**RE: FILE NUMBER: 0005382228, REFERENCE NUMBER: 5440824 - REQUEST FOR AN STA TO
ADD A SITE AND UPDATE TWO EXISTING SITES.**

Dear Sir or Madam,

This clarifying letter is provided as a part of the application amendment to File Number:
0005382228, Reference Number: 5440824.

The IT Solutions Department of the City of Fort Worth represents the City in matters relating to FCC licensing, antenna site registrations, etc. The City's 800 MHz band trunking system provides primary communications for over 9,000 users representing all City of Fort Worth agencies and over 15 Public Safety agencies in the Fort Worth area.

Fort Worth is in the process of upgrading its existing trunked radio system to an APCO P25 digital trunked radio system. The system will consist of a six-site 40 channel simulcast system with a four channel site serving the Texas Motor Speedway. In making this upgrade, the City is adding a simulcast site to the system to provide coverage in a high incident area of the City that lacks adequate coverage today.

The city is currently licensed under FCC call signs WNXE704 and KNGD801 for the 32 800 MHz NPSPAC channels and 8 Non-NPSPAC channels that are to be used in this upgrade. The City has received approval from the Region 40 Committee for its license modification. A copy of the Region 40 approval letter is attached.

The City has also received concurrence from the Transition Administrator (TA). A copy of the TA concurrence letter for this Licensing modification is also attached.

The City's FCC License modification application was submitted to APCO on June 26, 2012 and the FCC File Numbers are 0005391086 and 0005391579.

The City of Fort Worth requests a six month Special Temporary Authority (STA) to operate six of the 40 channels at the additional site and two adjacent sites. The reasons for this request are as follows:

- The City currently has a large area of inadequate coverage in a high incident area on the west side of the City where the new site is being located. With lack of coverage and the nature of incidents in this area, the officers occasionally must modify their responses. Due to lack of portable on-street coverage, officers will sometimes ensure multiple units are available when responding. The area can pose a significant threat to officer safety and response times. This was a contributing factor in the City's approval of this upgrade project and the early partial implementation of the City's new system. The City plans to migrate two (2) of the City's five (5) Police Divisions in October 2012. This partial "go-live" will help alleviate coverage issues and serve as a pilot test until the remaining implementation is completed during the summer of 2013. A six month STA will allow these two Police Divisions to operate with Public Safety grade coverage until the pending license grant.
- The STA will allow the City to immediately commence with necessary optimization and coverage testing.
- The City's pilot testing was originally scheduled to commence on July 1st 2012. However, several months were lost while obtaining Region 40 required Letters of Concurrence from adjacent channel users.

During the pilot operational period, the City will maintain its legacy system as a potential fall back if required.

The Commission's attention to this request is greatly appreciated. Please direct any questions regarding this application to me at the address below.

Sincerely,



Alan Girton
Senior Manager – Security/Communications